

1 LEONARD T. FINK, ESQ.  
Nevada Bar No. 6296  
2 **SPRINGEL & FINK LLP**  
9075 W. Diablo Drive, Suite 302  
3 Las Vegas, Nevada 89148  
Telephone: (702) 804-0706  
4 E-Mail: *lfink@springelfink.com*

5 Attorneys for Defendant,  
6 *RESURGENT CAPITAL SERVICES, L.P.*

7  
8 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**  
9

10 GEORGE RACE,

11 Plaintiff,

12 vs.

13 RESURGENT, CAPITAL SERVICES, LP DBA  
CAPITAL PORTFOLIO SERVICES, LLC, DBA  
14 CAPITAL PORTFOLIO GROUP, LLC, AND  
NORTHEAST CAPITAL, LLC,  
15

16 Defendants.

Case No.: 2:24-cv-02286-JCM-DJA

**STIPULATION TO EXTEND DEFENDANT  
RESURGENT CAPITAL SERVICES, L.P.'S  
TIME TO RESPOND TO PLAINTIFF'S  
COMPLAINT**

**[FIRST REQUEST]**

17  
18 Defendant RESURGENT CAPITAL SERVICES, L.P. ("RESURGENT") and Plaintiff GEORGE  
19 RACE stipulate and agree as follows:

- 20 1. RESURGENT's time to respond to the Complaint (ECF No. 1), filed on December 10,  
21 2024 will be continued to January 24, 2025; and  
22 2. RESURGENT requires additional time to investigate the allegations and respond to the  
23 Complaint.

24 ///

25 ///

26 ///

27 ///

28 ///

3. This brief extension will also allow the parties to discuss a possible early resolution of the case to preserve the expenditure of unnecessary attorney's fees and costs. This is RESURGENT's first request for an extension.

DATED this 6<sup>th</sup> day of January, 2025

SPRINGEL & FINK LLP

*/s/ Leonard T. Fink*

By:

LEONARD T. FINK, ESQ.  
Nevada Bar No. 6296  
9075 W. Diablo Drive, Suite 302  
Las Vegas, Nevada 89148

Attorney for Defendant,  
*RESURGENT CAPITAL SERVICES, L.P.*

DATED this 6<sup>th</sup> day of January, 2025

FREEDOM LAW FIRM, LLC

*/s/ Gerardo Avalos*

By:

GEORGE HAINES, ESQ.  
Nevada Bar No. 9411  
GERARDO AVALOS, ESQ.  
Nevada Bar No. 15171  
8985 South Eastern Ave., Suite 100  
Las Vegas, Nevada 89123

Attorney for Plaintiff,  
*GEORGE RACE*

**IT IS SO ORDERED:**

DATED: 1/6/2025



UNITED STATES MAGISTRATE JUDGE  
U.S.D.C. Case No. 2:24-cv-02286-JCM-DJA

**CERTIFICATE OF SERVICE**  
**George Race v. Resurgent, Capital Services, LP, et al.**  
**U.S.D.C. Case No.: 2:24-cv-02286-JCM-DJA**

STATE OF NEVADA                     )  
   ) ss.  
 COUNTY OF CLARK                    )

I, Ella Wilczynski, declare:

I am a resident of and employed in Clark County, Nevada. I am over the age of eighteen years and not a party to the within action. My business address is 9075 W. Diablo Drive, Suite 302, Las Vegas, Nevada, 89148.

On **January 6, 2025**, I served the document described as ***Stipulation to Extend Defendant Resurgent Capital Services, L.P.'s Time to Respond to Plaintiff's Complaint*** on the following parties:

<input checked="" type="checkbox"/>	VIA ELECTRONIC SERVICE: by submitting the foregoing to the United States District Court for the District of Nevada's ECF-filing System for Electronic Service upon the Court's Service List pursuant to Rule 26(a)(1). The copy of the document electronically served bears a notation of the date and time of service. The original document will be maintained with the document(s) served and be made available, upon reasonable notice, for inspection by counsel or the Court.
<input type="checkbox"/>	VIA U.S. MAIL: by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas Nevada. I am "readily familiar" with the firm's practice of collection and processing correspondence by mailing. Under that practice, it would be deposited with the U.S. postal service on that same day with postage fully prepaid at Las Vegas, Nevada in the ordinary course of business.
<input type="checkbox"/>	VIA FACSIMILE: by transmitting to a facsimile machine maintained by the person on whom it is served at the facsimile machine telephone number at last given by that person on any document which he/she has filed in the cause and served on the party making the service. The copy of the document served by facsimile transmission bears a notation of the date and place of transmission and the facsimile telephone number to which transmitted. A confirmation of the transmission containing the facsimile telephone numbers to which the document(s) was/were transmitted will be maintained with the document(s) served.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Ella Wilczynski

\_\_\_\_\_  
 An employee of Springel & Fink LLP

**From:** [Gerardo Avalos](#)  
**To:** [Ben Mohandesj](#); [George Haines](#)  
**Cc:** [Paris Tertanni](#); [Ella Wilczynski](#); [Leonard Fink](#)  
**Subject:** RE: George Race v. Resurgent Capital Services, LP  
**Date:** Sunday, January 5, 2025 4:16:00 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image005.png](#)  
[image007.png](#)  
[image009.png](#)

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Hi Ben,

You are welcome to file with my signature.

Kind regards,

*Gerardo Avalos, Esq.*

Freedom Law Firm

Phone: 702-880-5554, Ext: 223

E-Fax: 702-385-5518

Email: [gavalos@freedomlegalteam.com](mailto:gavalos@freedomlegalteam.com)

8985 S. Eastern Avenue Suite 100

Las Vegas, NV 89123 (Henderson Office)

1180 N. Town Center Dr. Suite 100

Las Vegas, NV 89144 (Summerlin Office)

[www.FreedomLegalTeam.com](http://www.FreedomLegalTeam.com)

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**From:** Ben Mohandesi <bmohandesi@yumollp.com>  
**Sent:** Thursday, January 2, 2025 11:42 AM  
**To:** George Haines <ghaines@freedomlegalteam.com>; Gerardo Avalos <gavalos@freedomlegalteam.com>  
**Cc:** Paris Tertanni <ptertanni@freedomlegalteam.com>; Ella Wilczynski <ewilczynski@springelfink.com>; Leonard Fink <lfink@springelfink.com>  
**Subject:** Re: George Race v. Resurgent Capital Services, LP

Hi George,

Happy New Year.

Thank you again for the courtesy of the extension. The stipulation is attached. Please let us know if we may file with your e-signature.

Thank you!

--

Ben Mohandesi  
**YU | MOHANDESI LLP**  
633 West Fifth Street, Suite 2800  
Los Angeles, CA 90071  
[213.377.5505](tel:213.377.5505) Direct | [213.377.5501](tel:213.377.5501) Fax  
[www.yumollp.com](http://www.yumollp.com)

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